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Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

*IN RE: ZOOM VIDEO COMMUNICATIONS
INC. PRIVACY LITIGATION*

Master Case No. 5:20-cv-02155-LHK

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND CASE DEADLINES**

This Document Relates To:
All Actions//

STIPULATION

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs and Defendant Zoom Video Communications, Inc. (“Zoom”) (collectively, “the Parties”), by and through their attorneys of record, hereby stipulate as follows:

WHEREAS, the Parties are engaged in continued mediation before the Hon. Jay C. Gandhi (Ret.), which began in November 2020, and have reached agreement on certain material terms of a settlement;

WHEREAS, the Parties intend to complete settlement negotiations, finalize the details of a settlement, formally memorialize the settlement, and present the settlement to the Court for approval as expeditiously as possible;

WHEREAS, Zoom’s deadline to complete production of certain documents Zoom had committed to produce is currently set for April 9, 2021 (“the interim production deadline,” ECF No. 162);

WHEREAS, Plaintiffs’ deadline to file a SAC is currently set for April 12, 2021 (“the SAC deadline,” ECF No. 168 at 40);

WHEREAS, on February 23, 2021, the Court approved the Parties’ stipulation extending the deadline for Plaintiffs to file for class certification and extending related deadlines (ECF No. 162);

WHEREAS, on March 23, 2021, the Parties stipulated that Zoom’s deadline to answer the First Amended Consolidated Class Action Complaint (“FAC”) is 21 days after the deadline for Plaintiffs to file a Second Amended Consolidated Class Action Complaint (“SAC”) has expired (ECF No. 169);

WHEREAS, on April 5, 2021, the Court denied Zoom’s opposed motions to enter a revised case schedule and stay discovery (ECF No. 174);

WHEREAS, on April 7, 2021, the Court ordered Zoom to immediately resume its rolling production and ordered the Parties to meet and confer with respect to search terms to be applied for Zoom’s production of electronically stored information (ECF No. 175);

WHEREAS, the Parties are engaged in meeting and conferring on which documents Zoom

1 should prioritize for production by the interim production deadline, and

2 WHEREAS, the instant stipulation is jointly submitted by the parties and would not stay
3 discovery but would extend two immediate deadlines to facilitate the Court-ordered negotiations
4 on discovery, to allow further negotiation between the Parties regarding discovery scope including
5 with respect to the documents to be produced by Zoom by the interim production deadline, and to
6 further facilitate efforts at negotiating and finalizing a settlement agreement and presenting the
7 Court with a motion for preliminary approval;

8 NOW THEREFORE, Plaintiffs and Zoom through their respective counsel, pursuant to
9 Civil Local Rules 6-2 and 7-12, and subject to the Court's approval, hereby stipulate as follows:

- 10 1. The interim production deadline is extended to May 10, 2021 and the scope of this
11 production may be modified by the agreement of the Parties;
- 12 2. Plaintiffs' SAC deadline is extended until May 12, 2021;
- 13 3. All other deadlines shall remain the same.

14 **IT IS SO STIPULATED.**

15 Dated: April 7, 2021

ADHOOT & WOLFSON, PC

16 By: */s/ Tina Wolfson*

17 Tina Wolfson (174806)

18 Interim Co-Lead Counsel

19
20 Dated: April 7, 2021

COTCHETT, PITRE & MCCARTHY LLP

21 By: */s/ Mark C. Molumphy*

22 Mark C. Molumphy (168009)

23 Interim Co-Lead Counsel

24
25 Dated: April 7, 2021

COOLEY LLP

26 By: */s/ Michael G. Rhodes*

27 Michael G. Rhodes (116127)

28 Attorneys for Defendant

ZOOM VIDEO COMMUNICATIONS, INC.

[~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION, IS SO ORDERED

Dated: April 8, 2021



Hon. Lucy H. Koh
United States District Judge